



which he lives.

The Sentencing Commission designed the guidelines to produce an appropriate sentence for a first offender like Mr. Wehelie who has otherwise lived an unblemished life that has included years of laudable service to the United States government. Considering Mr. Wehelie's personal history as evinced by the letters written to this Court (Exhibit 1), the inexorable social and economic consequences of his felony conviction, and the government's acknowledgement regarding the absence of evidence of additional wrongdoing, a sentence of probation is sufficient to serve the goals of sentencing generally.<sup>1</sup> A term of probation is also sufficient in this case to deter similar conduct by others who might hold trusted positions within law enforcement agencies.<sup>2</sup>

WHEREFORE, it is submitted that a sentence of probation is appropriate in this case.

Respectfully submitted,

ABDIRIZAK HAJI RAGHE WEHELIE  
By Counsel

/s/\_\_\_\_\_  
Nina J. Ginsberg, Esquire  
VSB # 19472  
DiMuroGinsberg, P.C.  
1101 King Street, Suite 610  
Alexandria, VA 22314  
703-684-4333 (Phone)  
703-548-3181 (Fax)  
[nginsberg@dimuro.com](mailto:nginsberg@dimuro.com)

---

<sup>1</sup> Mrs. Wehelie was employed for eight years as an Associate Clinical Research Lab Manager for the Center of Prostate Disease Research located at the Walter Reed National Military Medical Center in Bethesda, MD. Shortly after her husband's arrest, she was abruptly fired because her security clearance and access to the Medical Center was revoked as a result of his arrest.

<sup>2</sup> It is submitted that the pre and post-indictment delays in this case are somewhat reflective of the degree to which the government felt a pressing need to deter similar conduct.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28<sup>th</sup> day of January, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record. I further certify that a copy was sent by e-mail to William Byerley, Probation Officer, at [William\\_byerley@vaed.uscourts.gov](mailto:William_byerley@vaed.uscourts.gov).

/s/ \_\_\_\_\_  
Nina J. Ginsberg, Esquire